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9	
10	UNITED STATES DISTRICT COURT
11	NORTHERN DISTRICT OF CALIFORNIA
12	SAN JOSE DIVISION
13	UNITED STATES OF AMERICA, ) No. CR 11-00422-01 LHK
14	Plaintiff, ) STIPULATION AND [ <del>PROPOSED</del> ] ) DISCOVERY PROTECTIVE ORDER
15	v. ) BETWEEN THE UNITED STATES AND DEFENDANT
16	EDWARD G. KLUJ
17	Defendant.
18	)
19	
20	Defendant Edward G. Kluj and the United States of America, by and through their counsel of
21	record, hereby agree and stipulate as follows:
22	1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal
23	Rules of Criminal Procedure, and its general supervisory powers.
24	2. This Order pertains to all discovery provided to or made available to defense
25	counsel as part of discovery in the above-cited case.
26	3. The discovery and information therein may only be used in connection with the
27	litigation of this case and for no other purpose. Defense counsel will return the discovery to the
28	government, or certify that has been shredded at the conclusion of the case.

- 4. Defense counsel shall not provide any of the discovery to any person other than to his respective defendant/client, or attorneys, law clerks, paralegals, secretaries, experts and investigators involved in the representation of his defendant/client, for the purpose of said representation. Further, in disclosing discovery to defendant, personal information contained in the discovery, including individuals' dates of birth, addresses (physical and email), telephone numbers, social security numbers, and driver's license numbers, shall be redacted, and shall not be provided to any defendant in any manner or form.
- 5. Defense counsel shall advise his respective defendant/client, employees, other authorized members of the defense team and defense witnesses of the terms of this stipulation and order, and that use of the subject discovery materials for a purpose other than in connection with the litigation of this case may be subject to criminal sanctions.
- 6. Defense counsel will store the discovery in a secure place and will exercise due diligence to ensure that it is not disclosed to third persons in violation of this agreement. Similarly, if defense counsel makes or causes to be made, copies of any of the discovery, defense counsel will exercise due diligence to maintain control of said copies and to ensure that said copies are stored in a manner to safeguard against the inappropriate use of said materials.

DATED: August 12, 2011 MELINDA HAAG United States Attorney

/s/

EUMI L. CHOI Assistant United States Attorney

DENNIS ROBERTS, ESQ.
Attorney for Edward G. Kluj

**ORDER** Based upon the stipulation of the parties, and for good cause shown, the Court HEREBY ORDERS that the terms of the stipulation between the United States and all defendants in this case pertaining to the discovery in this case be imposed. IT IS SO ORDERED. DATED: 8/16/2011 UNITED STATES MAGISTRATE JUDGE